

- Finally a sample from the mouth of New Cricket Spring was taken by USGS on Feb 14, 2012. It was shipped to Houston Lab on 2/15/12 and was received at the lab on 2/16/12.
- EPA will probably receive the results in 15 days.
- This was a period when water was injected near the sink holes for the last 3+ months and the PCP value is likely to be low.

Partial Deletion:

The concurrence letter to the State is part of a Partial Deletion process for the area where soil was treated. I had written to Carlos how the clean up numbers for PCP was 300 ppm, B(a)P was 6 ppm and Dioxin was 20 ppb.

Preliminary Remediation Goals (PRGs) for commercial / industrial for pentachlorophenol (PCP), benzo(a)pyrene (B(a)P), 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD) are provided below:

Chemical	PRG (10-6 or HQ = 1)	10-4 Level for Cancer PRG	Basis
PCP	2.7 mg/kg	270 mg/kg	Cancer
B(a)P	0.21 mg/kg	21 mg/kg	Cancer
2,3,7,8-TCDD	0.6 µg/kg	--	Non-cancer

It seems under the latest industrial standards (PRGs) the soil remedy part can be deleted per the Risk Assessors..According to a remediation report at the time of the RA no TCDD was present at the site. Boundary samples collected during remediation had 0.22 to 10.98 ppb TCDD equivalent.. The entire site is covered with 6 inches of clean soil. Yhus the current cleanp values meet all criteria except TCDD. If EPA accepts the 0.6 ppb as industrial standard, then the soil remedy cannot be deleted.

New Evaluation for PCP standards by ADEQ at the mouth of the New Cricket Spring is based on surface water quality:

Acute Standard =20.25 µg/l

Chronic Standard = 15.57 µg/l

I suppose the 20.25 µg/l conforms to the 18.9 ppb daily maximum of previous standard. The monthly average would conform to the 15.57 µg/l.

Q4. The RPM is influenced by data and facts only. Ofcourse we have to depend on McKesson for the facts as Remedial Action was completed more than 15 years back. The latest sampling split by EPA is not going resolve if New Cricket Spring is already cleaned up. In the fracture the residual PCP is dependent on how much flushing is taking place by injection around the sink hole.